

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA

In the matter of:	§	
	§	
Jewett W. Tucker, Jr.	§	
	§	
Debtor	§	Chapter 11
	§	Case No. 08-40990-LWD
Cynthia Tucker	§	
	§	
Movant	§	
v.	§	
	§	
Jewett W. Tucker, Jr.	§	
	§	
Respondent	§	

MOTION FOR RELIEF FROM STAY

Cynthia Tucker, through counsel, shows:

1.

Cynthia Tucker is married to the Debtor.

2.

She seeks a divorce, and to have the Superior Court resolve all issues incident to the divorce, including issues of dissolution of the marriage, child support, alimony, and the division of debts and property.

3.

To the extent that such an action may be precluded by the automatic stay of 11 U.S.C. §362(a), Mrs. Tucker seeks relief from the stay to pursue that action for "cause" as contemplated by 11 U.S.C. §362(d)(1).

THEREFORE, Cynthia Tucker respectfully requests that this Court modify the

stay of 11 U.S.C. §362 to permit her to bring a divorce action against the Debtor, and to assert any claims available to her under applicable non-bankruptcy law, including but not limited to claims for dissolution of the marriage, child support, alimony, and divisions of debts and property, and to pursue that action through judgment and enforcement, using all remedies available to her under applicable non-bankruptcy law.

June 19, 2008

Respectfully submitted,

/s/ Mark Bulovic

Mark Bulovic, Attorney for
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